



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 30, 2008

FILE COPY

Fred R. Hammon
41364 Aksala Lane
Soldotna, AK 99669

Dear Underground Storage Tank (UST) Owner/Operator:

This letter is in reference to your UST facility(s) at the following address(es):

Soldotna Y Chevron
44024 Sterling Hwy
Soldotna, AK 99669

The United States Environmental Protection Agency (EPA) has selected your facility(s), among others, for inspection of its UST systems, per the requirements of 40 CFR Part 280. [Note: This will be a federal inspection. Alaska Department of Environmental Conservation (ADEC) has separate authorities and inspection processes, which may be different from EPA's.]

The physical inspection will be done the week of August 11, 2008. You will be called by the inspector, before the inspection, for the purpose of setting up an appointment. You may ask any questions pertaining to the inspection, when you are called.

The following are general summaries of the records that you will need to have on-site for the inspection. More specifics to your particular situation can be discussed with the EPA inspector who calls you. The numbers in parenthesis are references to paragraph numbers in the attached EPA regulations, so that you can review the specifics of the requirements. Here is what you need to have on hand:

1. Documentation of **Underground Storage Tank (UST)** financial responsibility mechanism(s) used to demonstrate that you have met the UST financial responsibility requirements. Generally, facilities have insurance, which means that you would need a copy of your UST "Certificate of Insurance" or UST "Endorsement", in the EPA required legal language, specified in regulation (see the attached Dollars and Sense: Financial Responsibility Requirements for Underground Storage Tanks, pages 10-11, wherein you will find the specific language required by EPA for your UST insurance to be considered meeting requirements). You need to include the required list or attachment showing the facility(s)/tank(s) covered, also.

If you have another form of UST financial responsibility, such as self-insurance, then you will need a signed copy of that UST mechanism, in the EPA required language, per the UST regulations, and any supporting attachments for that particular mechanism (e.g., for UST self-insurance you will need to show a copy of the current UST "Letter from Chief Financial Officer", including the data for UST Alternative I or II that proves that you can use the UST mechanism and the required list showing UST

facilities covered, per 40 CFR 280.95(d)).

For the purposes of these inspections, an UST "Certification of Financial Responsibility", ACCORD page, Declarations page, etc. will not suffice to show compliance. EPA will be looking for the UST financial responsibility mechanism itself, per UST regulatory requirements (40 CFR 280.95 to 280.107).

2. **Documentation showing how you upgraded your UST systems** by the addition of corrosion protection, spill, and overfill equipment (40 CFR 280.20 for new tank installations and 40 CFR 280.21 for existing, upgraded systems). Examples of the types of information that will document the upgraded status of your facility are pictures of the installation of the equipment, warranties (showing installation date and type of equipment), paid invoices showing the type of equipment that was installed, or being able to physically show the inspector the equipment.
3. **Documentation needed for metal upgraded tanks and/or piping:**
 - a. All metal tanks where interior lining or cathodic protection were added to existing tanks, you need to have documentation as to the means of ensuring the tanks' integrity (e.g., visual internal inspection, mean time to corrosion test results, etc.) and results showing that they passed this integrity assessment (40 CFR 280.21(b)).
 - b. For tanks that have been lined, you need to have documentation of an internal inspection, if it has been 10 years since the lining was done (unless you also have cathodic protection, in which case you do not have to do internal inspections).
 - c. For metal tanks and/or piping that have had cathodic protection added, documentation of the operation of your corrosion protection equipment (40 CFR 280.31):
 - For all systems, the test results of the last two corrosion system tests, required within 6 (six) months of installation and every three years thereafter.
 - Additionally, if you have an impressed current system (i.e., a rectifier system), the results of the last three inspections of your equipment, documented by your log of impressed current readings, which are required every 60 days.
4. **Recent compliance with the release detection requirements (40 CFR 280.45):**
 - a. Documentation of the results of release detection monitoring for the tanks and piping, required every month, for the past 12 months, for your particular method.

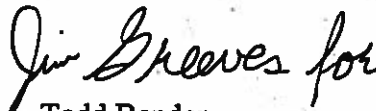
(Note: For pressurized piping this will generally mean the "last annual test of the operation" of the automatic line leak detectors and the last annual line tightness test or documentation of a monthly monitoring method (e.g., sump sensor

monitoring records).)

- b. Records of any tightness testing for each tank and/or its piping, where required.
 - c. If you are using any equipment to conduct your release detection (e.g., an Automatic Tank Gauging (ATG) system, etc.) be sure to have a copy of the manufacturer's "Results of US EPA Standard Evaluation" for your particular equipment (often called a "third party evaluation"). Also, you will be asked to demonstrate the use of any equipment.
 - d. Written documentation of all equipment calibration, maintenance, and repair for at least the last year. You may also be asked to provide a copy of all equipment calibration and maintenance schedules, that the manufacturer requires, to keep the equipment functioning properly, depending on your situation.
5. To facilitate the inspection, **have all areas that are normally secured in some manner (e.g., turbine sumps, fills, dispensers, etc.), unlocked and/or unbolted (especially, turbine sump covers).**
6. The records that the inspector will be looking for, should be those that you had (or the testing results that you had) as of the date you received this letter (i.e., the date that you receive the letter is the date that the inspection starts, so the data for testing, etc. that you have at that time, is what will be evaluated). If you have had work done since this date, that will be evaluated, but the Inspector will also need to see the previous set of records (e.g., if you have had a line tightness test done since receiving this letter, then the inspector will need to see the previous set of test results). What the Inspector is looking for is your compliance status when you receive this letter, not after you have had further work done at the site.

Thank you for your cooperation in this matter. If you have any questions, please feel free to contact Jim Greeves at 360-753-8072.

Sincerely,



Todd Bender
EPA UST Coordinator
for Alaska

Enclosures